1 LAW OFFICES OF DALE K. GALIPO Dale K. Galipo (SBN 144074) 2 dalekgalipo@yahoo.com Cooper Alison-Mayne (SBN 343169) 3 cmayne@galipolaw.com 21800 Burbank Boulevard, Suite 310 4 Woodland Hills, CA 91367 Phone: (818) 347-3333 5 Attorneys for Plaintiff Dorothey Heimbach 6 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 2:23-cv-01887-DJC-CSK 11 DOROTHEY HEIMBACH, 12 Plaintiff, Assigned to: District Judge Daniel J. Calabretta 13 VS. PLAINTIFF'S PROPOSED 14 STANISLAUS COUNTY, JUSTIN VERDICT FORM CAMARA, and ZA XIONG, 15 FPTC Date: December 18, 2025 Defendants. 1:30 PM Time: 16 Location: Courtroom 7 17 18 PLEASE TAKE NOTICE that Plaintiff Dorothey Heimbach hereby submits 19 Plaintiff's Proposed Verdict Form for the trial of this matter. 20 21 22 23 24 25 26 27 28

| PLAINTIFF'S PROPOSED VERDICT FORM | | | | |
|--|--|--|--|--|
| | | | | |
| We, the jury in the above-entitled action, find the following: | | | | |
| | | | | |
| FOURTH AMENDMENT EXCESSIVE FORCE CLAIM | | | | |
| QUESTION 1: Did defendants use excessive or unreasonable force or integrally | | | | |
| participate in the use of excessive or unreasonable force against Anthony Silva? | | | | |
| | | | | |
| Justin CamaraYESNO | | | | |
| | | | | |
| | | | | |
| Za XiongYESNO | | | | |
| | | | | |
| If you answered "Yes" for either defendant, proceed to Question 2. | | | | |
| If you answered "No" for both defendants, proceed to Question 3. | | | | |
| | | | | |
| QUESTION 2: Was the use of excessive or unreasonable force or integral | | | | |
| participation in the use of excessive or unreasonable force a cause of injury, harm, | | | | |
| or death to Anthony Silva? | | | | |
| | | | | |
| Justin CamaraYESNO | | | | |
| | | | | |
| | | | | |
| Za Xiong YESNO | | | | |
| | | | | |
| Proceed to Question 3. | | | | |
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| 1 | BATTERY CLAIM | | | |
|----|---|--|--|--|
| 2 | QUESTION 3: Did the defendants use excessive or unreasonable force against | | | |
| 3 | Anthony Silva? | | | |
| 4 | | | | |
| 5 | Justin CamaraYESNO | | | |
| 6 | | | | |
| 7 | | | | |
| 8 | Za XiongYESNO | | | |
| 9 | | | | |
| 10 | If you answered "Yes" for either defendant, proceed to Question 4. | | | |
| 11 | If you answered "No" for both defendants, proceed to Question 5. | | | |
| 12 | if you answered two for both defendants, proceed to guestion 5. | | | |
| 13 | QUESTION 4: Was the use of excessive or unreasonable force by either of the | | | |
| 14 | defendants a cause of injury, harm, or death to Anthony Silva? | | | |
| 15 | action during at each of injury, name, or actual to finding of the | | | |
| 16 | Justin Camara YES NO | | | |
| 17 | | | | |
| 18 | | | | |
| 19 | Za XiongYESNO | | | |
| 20 | | | | |
| 21 | | | | |
| 22 | Proceed to Question 5. | | | |
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| 1 | NEGLIGENCE CLAIM | | | | |
|----------|--|--|--|--|--|
| 2 | QUESTION 5: Were the defendants negligent? | | | | |
| 3 | | | | | |
| 4 | Justin CamaraYESNO | | | | |
| 5 | | | | | |
| 6 | | | | | |
| 7 | Za XiongYESNO | | | | |
| 8 | | | | | |
| 9 | If you answered "Yes" for either defendant, proceed to Question 6. | | | | |
| 10 | If you answered "No" for both defendants, proceed to Question 10. | | | | |
| 11 | | | | | |
| 12 | QUESTION 6: Was the negligence of either defendant a substantial factor in | | | | |
| 13 | causing injury, harm, or death to Anthony Silva? | | | | |
| 14 | | | | | |
| 15 | Justin CamaraYESNO | | | | |
| 16 17 | | | | | |
| 18 | | | | | |
| 19 | Za XiongYESNO | | | | |
| 20 | | | | | |
| 21 | If you answered "Yes" for either defendant, proceed to Question 7. | | | | |
| 22 | If you answered "No" for both defendants, proceed to Question 10. | | | | |
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| 1 | QUESTION 7: Was Anthony Silva negligent? | | | | |
|----|--|----|--|--|--|
| 2 | | | | | |
| 3 | YES | NO | | | |
| 4 | | | | | |
| 5 | If you answered "Yes," proceed to Question 8. | | | | |
| 6 | If you answered "No," proceed to Question 9. | | | | |
| 7 | | | | | |
| 8 | QUESTION 8: Was the negligence of Anthony Silva a substantial factor in | | | | |
| 9 | causing his own injury, harm, or death? | | | | |
| 10 | | | | | |
| 11 | YES | NO | | | |
| 12 | | | | | |
| 13 | Proceed to Question 9. | | | | |
| 14 | | | | | |
| 15 | QUESTION 9: What percentage of negligence that was a cause of Anthony | | | | |
| 16 | Silva's injury, harm, or death do you assign to Justin Camara, Za Xiong, and | | | | |
| 17 | Anthony Silva. (Total should equal 100%). | | | | |
| 18 | | | | | |
| 19 | Justin Camara % | | | | |
| 20 | Za Xiong % | | | | |
| 21 | Anthony Silva % | | | | |
| 22 | | | | | |
| 23 | | | | | |
| 24 | Total 100% | | | | |
| 25 | | | | | |
| 26 | Proceed to Question 10. | | | | |
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| 28 | | | | | |

| 1 | FOURTEENTH AMENDMENT CLAIM | | | |
|----------|---|-------------|---------------------|------------|
| 2 | QUESTION 10: Did defendants engage in conduct that deprived Plaintiff of her | | | |
| 3 | familial relationship with Anthony Silva, in violation of the Fourteenth | | | |
| 4 | Amendment? | | | |
| 5 | Justin CamaraYES | | NO | |
| 6 | | | | |
| 7 | | | | |
| 8 | Za XiongYES | | NO | |
| 9 | | | | |
| 0 | Proceed to Damages. | | | |
| 11 | | | | |
| 12 | DAM. | AGES | | |
| 13 | Please read the instructions before each question and answer only those questions | | | |
| 14 | you are directed to. | | | |
| 15 | | | | |
| 16 | Answer Question 11 if you answered "Yes | "for any | defendant in Que | stion 2, |
| 17 | Question 4, or Question 6. | | | |
| 8 | QUESTION 11: What are Anthony Silva | 's damage | es for his pre-deat | h pain and |
| 19 | suffering and loss of life? | | | |
| 20 21 | | | | |
| 22 | Pre-death pain and suffering: | \$ | | _ |
| 23 | Loss of Life: | \$ | | _ |
| 24 | | | | |
| 25 | Answer Question 12 if you answered "Yes" for any defendant in Question 4, | | | stion 4, |
| 26 | Question 6, or Question 10. | | | |
| 27 | | | | |

| 1 | QUESTION 12: What are the Plaintiff's wrongful death damages for the loss of | | | |
|------------|--|-----------------|--|--|
| 2 | Anthony Silva? | | | |
| 3 | | | | |
| 4 | Past wrongful death damages: | \$ | | |
| 5 | Future wrongful death damages: | | | |
| 6 | | | | |
| 7 | | | | |
| 8 | Please sign and date the verdict form and return it to the Court. | | | |
| 9 | | | | |
| 10 | Date: | | | |
| 11 | | Jury Foreperson | | |
| 12 | | | | |
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